

1

00:00:00,000 --> 00:00:20,600
(Music Playing)

2

00:00:20,600 --> 00:00:28,733
Hi, my name is Teresa Thompson and I would like to welcome you to this session on Adjudicating Transfers of Operating Rights.

3

00:00:28,733 --> 00:00:36,799
This training was developed with you, the adjudicator in mind to assist you in processing these adjudicative actions.

4

00:00:36,800 --> 00:00:45,300
I have worked in the Oil and Gas Program for more than 30 years and have performed many different jobs relating to oil and gas.

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00:00:45,300 --> 00:00:48,300
Here is a brief summary of my career:

6

00:00:48,300 --> 00:00:55,100
I started as a receptionist, then a petroleum engineering assistant, a petroleum engineer technician,

7

00:00:55,100 --> 00:01:03,533
a land law examiner and I am currently a mineral leasing specialist attached to the Washington Office and working from Utah.

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00:01:03,533 --> 00:01:09,899
I have a vast knowledge of dealing with Applications for Permit to Drill, well completions,

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00:01:09,900 --> 00:01:14,366
first production memorandums, pre and post leasing actions,

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00:01:14,366 --> 00:01:18,832
and other operational and agreement issues.

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00:01:18,833 --> 00:01:28,666

I suggest you print this presentation with space for taking notes and the case exercises found in the Student Material folder before starting.

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00:01:28,666 --> 00:01:36,432

Copies of documents, including IM's referenced during this presentation are also found in the Student Materials.

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00:01:36,433 --> 00:01:46,066

Today we are going to be discussing and learning how to adjudicate transfers of operating rights for oil and gas and geothermal leases.

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00:01:46,066 --> 00:01:53,399

Why is it important for you to know how to properly adjudicate the operating rights transfers?

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00:01:53,400 --> 00:02:01,366

It's important because the BLM is the office of record and it is our responsibility to know who the

16

00:02:01,366 --> 00:02:07,899

holders of operating rights are for any or all operational issues.

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00:02:07,900 --> 00:02:17,666

At the end of this training you will be able to adjudicate a sample transfer of operating rights.

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00:02:17,666 --> 00:02:23,332

To achieve the course objective: We will define transfer of operating rights

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00:02:23,333 --> 00:02:28,433

Explain why adjudication of operating rights was discontinued

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00:02:28,433 --> 00:02:34,433

Some negative impacts that occur when transfers are not adjudicated

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00:02:34,433 --> 00:02:42,099

Discuss some impacts of severing operating rights
Review the recently issued guidance

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00:02:42,100 --> 00:02:50,000

Review the requirements for adjudicating and will provide step by step guidance for processing transfers

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00:02:50,000 --> 00:03:01,766

and, Finally, you'll adjudicate some sample transfers of operating rights for compliance with regulations and guidance

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00:03:01,766 --> 00:03:10,432

What are operating rights? 43 CFR § 3100.0-5(d)
Definition states:

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00:03:10,433 --> 00:03:18,933

Operating right means the interest created out of a lease authorizing the holder of that right to enter

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00:03:18,933 --> 00:03:25,933

upon the leased lands to conduct drilling and related operations, including production of oil or

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00:03:25,933 --> 00:03:31,933

gas from such lands in accordance with the terms of the lease.

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00:03:31,933 --> 00:03:41,066

Basically this means they have the right to explore for, develop, and produce leased substances.

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00:03:41,066 --> 00:03:44,099

Operating rights are also known as working interests

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00:03:44,100 --> 00:03:49,100

and when you are dealing with agreements you will hear them referenced this way.

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00:03:49,100 --> 00:03:55,133

You should be aware that according to Section 30A of the Mineral Leasing Act, all transfers must

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00:03:55,133 --> 00:04:04,366

be approved within 60 days of receipt of the request for approval.

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00:04:04,366 --> 00:04:14,199

What is an Operating Rights Transfer? 43 CFR § 3100.0-5(e) Defines it as:

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00:04:14,200 --> 00:04:22,600

A transfer means any conveyance of an interest in a lease by assignment, sublease or otherwise.

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00:04:22,600 --> 00:04:29,533

The term sublease which means a transfer of non-record title interest in a lease, i.e.

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00:04:29,533 --> 00:04:36,033

a transfer of operating rights is normally a sublease and a sublease also is a subsidiary

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00:04:36,033 --> 00:04:43,366

arrangement between the lessee, and the sublessee. . . Nor does it affect the relationship

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00:04:43,366 --> 00:04:48,932

imposed by a lease between the lessee and the U.S.

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00:04:48,933 --> 00:04:54,133

This means that operating rights are severable from record title.

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00:04:54,133 --> 00:05:02,366

For example: I give 100 percent of my operating rights interest to ABC Company.

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00:05:02,366 --> 00:05:09,699

I am still the lessee of record, but I have no say in what happens on my lease.

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00:05:09,700 --> 00:05:17,166

ABC Company has all the rights to explore for,

develop and produce leased substance.

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00:05:17,166 --> 00:05:24,999

I am still ultimately responsible for costs which occur on my lease. So, if ABC Company fails to

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00:05:25,000 --> 00:05:32,233

pay royalties due and the Office of Natural Resources Revenue (ONRR) is unable to collect

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00:05:32,233 --> 00:05:40,799

from them, I am still liable to pay the government all monies owed.

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00:05:40,800 --> 00:05:46,633

Why is it important to know who holds an interest in Operating Rights?

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00:05:46,633 --> 00:05:54,166

It's important because: The holder has responsibilities - Upon approval of the transfer,

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00:05:54,166 --> 00:06:00,799

the operating rights holder is responsible for the lease obligations under the lease.

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00:06:00,800 --> 00:06:07,400

The BLM and the ONRR have a mutual responsibility to ensure production accountability

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00:06:07,400 --> 00:06:13,466

and lease oversight so the United States receives proper royalty payments.

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00:06:13,466 --> 00:06:23,966

A lessee may also be an operating rights owner in a lease if they did not transfer all of their operating rights in a lease.

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00:06:23,966 --> 00:06:28,899

Let's discuss the history concerning operating rights approval.

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00:06:28,900 --> 00:06:36,300

In 1985, Solicitors determined there was no legal requirement to adjudicate operating rights and

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00:06:36,300 --> 00:06:41,733

that it was not necessary for administrative purposes, for BLM to determine the various

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00:06:41,733 --> 00:06:48,699

percentages of interests in operating rights which was being conveyed or to attempt to ensure that

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00:06:48,700 --> 00:06:55,500

the transferee was receiving the full interest which was purportedly being conveyed.

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00:06:55,500 --> 00:07:01,066

They also determined that an operating rights transfer was an agreement between private

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00:07:01,066 --> 00:07:07,966

parties who assume this responsibility and it is not a transfer which affects the lessee's liability to the

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00:07:07,966 --> 00:07:15,499

Government for rent, royalty, and damage to the leasehold.

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00:07:15,500 --> 00:07:20,966

In response to the Solicitors determination, Washington Office Instruction Memorandum

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00:07:20,966 --> 00:07:34,266

86-175 was issued on December 30, 1985. The IM provided guidance on processing oil and gas lease operating rights transfers.

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00:07:34,266 --> 00:07:40,966

The IM stated that the current method of reviewing operating rights transfers, which don't affect the

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00:07:40,966 --> 00:07:48,332

record title to a lease, is time-consuming and long delays are created in processing.

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00:07:48,333 --> 00:07:56,066

The IM gave direction that effective immediately, to help expedite the processing of operating rights,

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00:07:56,066 --> 00:08:01,099

we are to discontinue abstracting transfers of operating rights.

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00:08:01,100 --> 00:08:06,566

Instead we were instructed to stamp a disclaimer to each approved transfer and assignment

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00:08:06,566 --> 00:08:19,066

document which stated "Approval does not warrant that either party to this transfer holds legal or equitable title to this lease."

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00:08:19,066 --> 00:08:26,332

Two of the issues that resulted from this policy of no longer adjudicating transfers of operating rights

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00:08:26,333 --> 00:08:39,666

were that it conflicted with the "Drainage Rule" and the Royalty Simplification and Fairness Act of 1996.

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00:08:39,666 --> 00:08:49,366

Drainage is covered in 43 CFR § 3162.2-7 which states that record title interest owners and

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00:08:49,366 --> 00:08:57,332

operating rights interest owners are jointly and severally liable for drainage affecting the area and

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00:08:57,333 --> 00:09:04,733

horizons in which they hold operating rights during the period they hold operating rights.

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00:09:04,733 --> 00:09:10,166

What this means is each party is responsible to protect the lease from drainage whether

74

00:09:10,166 --> 00:09:17,432
separately, individually, or each in turn;
respectively.

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00:09:17,433 --> 00:09:23,099
When a drainage issue has been determined to
be affecting the lease, the BLM requires the

76
00:09:23,100 --> 00:09:31,633
record title interest owner and/or operating rights
interest owners to either drill a protective well

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00:09:31,633 --> 00:09:39,333
or pay the government compensatory royalty. Since, we currently do not
adjudicate percentages

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00:09:39,333 --> 00:09:47,099
of interests, depths or formations, and whether or
not the transferor holds this interest in the lease

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00:09:47,100 --> 00:09:57,933
or what interest the transferee is receiving, the
BLM does not know whom to issue the demand to.

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00:09:57,933 --> 00:10:05,566
Royalty Simplification and Fairness Act says that:The owner of operating
rights in a lease is

81
00:10:05,566 --> 00:10:11,766
primarily liable for its pro rata share of payment
obligations under the lease.

82
00:10:11,766 --> 00:10:21,332
The owner of record title in a lease is secondarily
liable for its pro rata share of payment obligations
under the lease.

83
00:10:21,333 --> 00:10:28,299
In order for ONRR pursue payment of owed
royalty, they must first try to obtain payment from

84
00:10:28,300 --> 00:10:35,833
the owner of the operating rights. If they fail to
receive the monies owed, they can then pursue

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00:10:35,833 --> 00:10:44,866

the owner of record title. ONRR relies on BLM's record to pursue the proper parties to pay unpaid royalties.

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00:10:44,866 --> 00:10:53,266

To accomplish this, ONRR needs to know who the holders are and what percentages of interest they own.

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00:10:53,266 --> 00:11:01,932

A copy of this act is provided in your student materials.

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00:11:01,933 --> 00:11:10,066

Once the operating rights transfer is approved, the record title and operating rights are severed forever.

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00:11:10,066 --> 00:11:19,032

Both a record title assignment and operating rights transfer must be filed for all future transfers.

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00:11:19,033 --> 00:11:26,366

If the lessee of record and operating rights owner become the same party, both forms are required.

91

00:11:26,366 --> 00:11:33,732

For example: Let's say that I transfer 50% of my operating rights in the lease to Joe Smith.

92

00:11:33,733 --> 00:11:41,599

A few years go by and Joe Smith transfers the 50% operating rights back to me.

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00:11:41,600 --> 00:11:49,800

Even though I own 100% Record Title and Operating Rights, because I have severed 50% of

94

00:11:49,800 --> 00:12:00,266

the operating rights interest, I will need to file both record title and operating rights forms if I ever sell my lease.

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00:12:00,266 --> 00:12:06,199

If you are uncertain whether the operating rights have been severed, but the intent of a record title

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00:12:06,200 --> 00:12:12,700

assignment is to transfer all of the assignor's interest in the lease, which includes record title

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00:12:12,700 --> 00:12:20,366

and operating rights interests, a statement attesting to such intent, needs to be included at

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00:12:20,366 --> 00:12:24,866

the bottom of the land description section of the conveyance form.

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00:12:24,866 --> 00:12:32,366

A sample statement is provided in your reference material.

100

00:12:32,366 --> 00:12:40,866

On the following scenario which form or forms - A Record Title Assignment or Transfer of Operating Rights

101

00:12:40,866 --> 00:12:51,466

or both would be needed to be filed if Company A wants to assign 25% of all their interest to Company C.

102

00:12:51,466 --> 00:12:58,232

The Record Title for the lease is held by Company A and Company B with 50% ownership each.

103

00:12:58,233 --> 00:13:06,033

The Operating Rights are held by Company A with 75% and Company B with 25%.

104

00:13:06,033 --> 00:13:19,633

Please pause the presentation while you determine which form or forms are required and return after you are done.

105

00:13:19,633 --> 00:13:27,466

The answer is: Company A would be required to file both a record title assignment and

106

00:13:27,466 --> 00:13:40,966

an operating rights transfer to convey their interests because the operating rights have been severed and the percentages are different.

107

00:13:40,966 --> 00:13:48,732

In 2012, the solicitors reviewed their earlier policy and determined that in order to comply with the Drainage Rule

108

00:13:48,733 --> 00:13:57,466

and the Royalty Simplification and Fairness Act, the BLM needs to be adjudicating operating rights transfers.

109

00:13:57,466 --> 00:14:08,232

In response to this determination WO IM 2013-105, titled Adjudication of Oil and Gas

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00:14:08,233 --> 00:14:15,899

and Geothermal Operating Rights Assignments was issued April 4, 2013.

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00:14:15,900 --> 00:14:24,066

A copy of this IM is provided in your reference material.

112

00:14:24,066 --> 00:14:31,366

The IM directs BLM to adjudicate operating rights using the following policy:

113

00:14:31,366 --> 00:14:40,566

For leases on which production began on or after October 1, 2012, BLM state offices must

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00:14:40,566 --> 00:14:48,066

adjudicate operating rights transfers immediately following notification of commencement of production

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00:14:48,066 --> 00:14:56,666

and adjudicate and maintain all operating rights transfers for those lease files.

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00:14:56,666 --> 00:15:02,866

What this means that when you receive a first production memorandum or an approval of a

117

00:15:02,866 --> 00:15:12,399

participating area and the lease becomes productive, you must adjudicate all operating right transfers for the lease.

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00:15:12,400 --> 00:15:20,300

Leases on which production began prior to October 1, 2012, the BLM must adjudicate past

119

00:15:20,300 --> 00:15:27,800

operating right transfers only to the extent necessary to enable ONRR to issue proper orders

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00:15:27,800 --> 00:15:35,300

to the operating rights owners. This will be done on a case by case basis. ONRR will make a

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00:15:35,300 --> 00:15:42,466

request to the BLM for the information. Offices should adjudicate all remaining

122

00:15:42,466 --> 00:15:50,199

unadjudicated operating rights transfers as time and staffing allow.

123

00:15:50,200 --> 00:15:56,300

The IM goes on to state that the BLM will adjudicate the operating rights ownership,

124

00:15:56,300 --> 00:16:03,000

including the relative percentages of operating rights holders' interest and will update the

125

00:16:03,000 --> 00:16:11,300

Legacy Rehost (LR2000) System and prepare a

Lease Interest Worksheet which reflects the

126

00:16:11,300 --> 00:16:22,000

ownership of the operating rights for the lease.

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00:16:22,000 --> 00:16:29,200

Regulations pertaining to Transfers by Assignment, Sublease or Otherwise are found in

128

00:16:29,200 --> 00:16:39,133

43 CFR § 3106. The guidance to process transfers is found in the Handbook 3106-1.

129

00:16:39,133 --> 00:16:46,499

We are not covering the steps to use on denying or rejecting a transfer or requesting additional information.

130

00:16:46,500 --> 00:16:53,100

These processes and form letters can be found in the 3106-1 Handbook.

131

00:16:53,100 --> 00:17:06,266

The handbook is outdated and the new policy for WO IM 2013-015 will be incorporated into the handbook when it is updated.

132

00:17:06,266 --> 00:17:17,632

Further guidance in the IM states that: States are required to record all operating rights interest on a Lease Interest Worksheet and retain the

133

00:17:17,633 --> 00:17:28,066

worksheet in the lease case file and ensure all operating transfers are entered into the Customer Detail Screen in LR2000.

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00:17:28,066 --> 00:17:35,366

Copies of the attachments included with the IM, a worksheet and a sample Serial Register Page

135

00:17:35,366 --> 00:17:41,032

showing the updates are included in your student materials.

136

00:17:41,033 --> 00:17:53,399

Let's run through the checklist quickly and then you'll have an opportunity to practice adjudicating

137

00:17:53,400 --> 00:18:03,333

some transfers of operating rights. You have a copy of this checklist in your course materials if you want to follow along with me.

138

00:18:03,333 --> 00:18:10,933

I am going to go back to the power point presentation, but please follow along with me on this form.

139

00:18:10,933 --> 00:18:16,466

The transfer must be on an acceptable form filed in triplicate

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00:18:16,466 --> 00:18:20,699

The form must be dated June 1988 and later

141

00:18:20,700 --> 00:18:30,133

The form to be used is the 3000-3a - Transfer of Operating Rights, this form can transfer:

142

00:18:30,133 --> 00:18:37,666

a specific depth, an example would be from the surface to a depth of 3,600 feet;

143

00:18:37,666 --> 00:18:44,599

be for a specific formation, an example would be the Green River Formation or maybe from the

144

00:18:44,600 --> 00:18:51,500

Surface to the Base of the Wasatch Formation; or Include only a portion of the lease, say that the

145

00:18:51,500 --> 00:19:01,100

lease is for the north half of Section 12, and the transfer is only for the NE quarter.

146

00:19:01,100 --> 00:19:10,533

As a reminder, I am not covering the steps to use on denying or rejecting a transfer or requesting additional information.

147

00:19:10,533 --> 00:19:22,266

If any of the required information is missing, the processes and form letters can be found in the 3106-1 Handbook.

148

00:19:22,266 --> 00:19:28,932

Verify the transfer has been submitted with the required filing fee. The fee schedule can be found

149

00:19:28,933 --> 00:19:39,133

in 43 CFR § 3000.12. The federal register publishes the updated fee each year at the end of September.

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00:19:39,133 --> 00:19:44,399

The fee for fiscal year 2013 is \$85.

151

00:19:44,400 --> 00:19:50,566

A copy of the receipt should be provided to you by the accounts section.

152

00:19:50,566 --> 00:19:57,966

Verify that 3 copies of the transfer must be originally signed and dated by Transferor.

153

00:19:57,966 --> 00:20:04,366

Verify that 1 copy of the transfer must be originally signed and dated by Transferee.

154

00:20:04,366 --> 00:20:12,499

Verify that the transfer form is date-time stamped by the BLM mail room. If the transfer is missing the

155

00:20:12,500 --> 00:20:19,166

date-time stamp, check the CBS receipt for a received date and use that date.

156

00:20:19,166 --> 00:20:26,632

Verify that the Commodity and Interest conveyed box for operating rights must be checked.

157

00:20:26,633 --> 00:20:37,066

Verify that the lease number is correct. Verify that the legal description shown of the transfer must be contained in the lease.

158

00:20:37,066 --> 00:20:52,666

Verify that the percentage of interest owned by transferor is correct and does this agree with our records?

159

00:20:52,666 --> 00:21:01,099

Verify that the transfer has been filed with the BLM within 90 days of execution by the transferor.

160

00:21:01,100 --> 00:21:08,166

If the transfer is not filed within the 90 day timeframe, a Full Force and Effect Statement

161

00:21:08,166 --> 00:21:13,766

signed by all parties may be required by the authorized officer.

162

00:21:13,766 --> 00:21:23,699

What is the status of the lease? Is the lease terminated or expired? You can check LR2000 to determine this.

163

00:21:23,700 --> 00:21:31,500

Is rental or royalty paid? If the transfer is filed close to the anniversary date, you will want to

164

00:21:31,500 --> 00:21:38,233

verify that the lease is in good standing. The Washington Office is in discussion with ONRR

165

00:21:38,233 --> 00:21:44,433

to have the rental payments received entered into LR2000.

166

00:21:44,433 --> 00:21:53,266

Determine if bonding is required. If the lease is held by production, then a bond adequacy review is needed.

167

00:21:53,266 --> 00:22:02,199

Follow your office policy and the procedures outlined in Washington Office IM 2010-161 which

168

00:22:02,200 --> 00:22:17,266

has been supplemented by WO IM 2013-151. Copies are provided in the reference material.

169

00:22:17,266 --> 00:22:23,599

When everything is complete and ready for approval, prepare the lease interest worksheet.

170

00:22:23,600 --> 00:22:28,933

The worksheet will reflect the new operating rights ownership.

171

00:22:28,933 --> 00:22:35,566

Prepare the transfer for signature by the AOThe transfer is effective the first day of the month

172

00:22:35,566 --> 00:22:42,799

following the date of filing. After approval, one originally sign copy goes in the lease file,

173

00:22:42,800 --> 00:22:51,533

one copy is return to the transferee and the third is sent to the Field Office or follow your office policy.

174

00:22:51,533 --> 00:22:58,133

File the lease interest worksheet in the case file on top of the approved transfer.

175

00:22:58,133 --> 00:23:05,299

In Utah, the worksheet is printed on color paper to make it easy to identify transfers in the case.

176

00:23:05,300 --> 00:23:11,600

I'd suggest that your office create a shared directory to save the lease interest worksheets in.

177

00:23:11,600 --> 00:23:18,700

You can use the saved copy when preparing a new transfer. This will save you valuable time.

178

00:23:18,700 --> 00:23:26,533

Update LR2000 to show the approval Using the date of approval by the AO, enter Action Code

179

00:23:26,533 --> 00:23:39,199

933. In Action Remarks enter: EFF MM/DD/YY;

180

00:23:39,200 --> 00:23:47,366

If more than one transfer is approved and effective the same date, enter a number after the semicolon.

181

00:23:47,366 --> 00:24:00,099

Example is EFF 02/01/13; 1. LR2000 will not allow 2 entries to be identical,

182

00:24:00,100 --> 00:24:06,866

so you would need to enter the 1, 2, 3 etc. after the semicolon.

183

00:24:06,866 --> 00:24:13,832

Next update the customer on the Interest Relationship Screen with a 0% interest and

184

00:24:13,833 --> 00:24:23,266

remove the transferor if applicable. An example would be that if I have a 50% operating rights interest

185

00:24:23,266 --> 00:24:30,966

and I give 25% to ABC Company, you would leave my name and add ABC Company to

186

00:24:30,966 --> 00:24:39,099

the Interest Relationship Screen. If I give all 50% of my interest to ABC Company, you would remove

187

00:24:39,100 --> 00:24:45,766

my name and add ABC Company to the Interest Relationship Screen.

188

00:24:45,766 --> 00:24:52,966

For assistance on LR2000 entry, you can reference the handbook and/or case recordation data standards.

189

00:24:52,966 --> 00:24:59,099

There is also a Demo on entering information into LR2000 on the National Training Center

190

00:24:59,100 --> 00:25:09,166

Homepage, in the Knowledge Resource Center.

191

00:25:09,166 --> 00:25:13,499

What actions may BLM take if the requirements are not met?

192

00:25:13,500 --> 00:25:21,266

We can: Request additional information from the transferor or transferee; return the transfer of

193

00:25:21,266 --> 00:25:26,099

operating rights unapproved; or we can deny the transfer.

194

00:25:26,100 --> 00:25:32,933

Additional information that you might request is a full force and effect letter or additional bonding.

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00:25:32,933 --> 00:25:40,633

You would return the transfer unapproved if it was filed on an outdated form. If you requested

196

00:25:40,633 --> 00:25:47,766

additional information and never received it, you would deny the transfer.

197

00:25:47,766 --> 00:25:54,066

Let's imagine that you have received a transfer and the interest conveyed box is not checked.

198

00:25:54,066 --> 00:26:02,399

Is this a reason to return or deny the transfer? If you can determine that the intent is to transfer the

199

00:26:02,400 --> 00:26:08,733

operating rights by comparing the ownership and percentages and they match the prior transfer,

200

00:26:08,733 --> 00:26:16,499

then you can check the box for the transferor. If there are minor discrepancies that you can

201

00:26:16,500 --> 00:26:22,866

determine what the intent is, go ahead and make the minor changes in red. If you can resolve an

202

00:26:22,866 --> 00:26:29,299

issue with a phone call, maybe incorrect percentages, document with whom the call was

203

00:26:29,300 --> 00:26:36,000

with and the changes authorized on the transfer form and sign it. This will save you time as an

204

00:26:36,000 --> 00:26:41,033

adjudicator in not having to start the process over.

205

00:26:41,033 --> 00:26:47,733

PLEASE NOTE: The transfer may only be withdrawn by both the transferor and transferee.

206

00:26:47,733 --> 00:26:55,199

A transfer may be withdrawn at any time prior to approval.

207

00:26:55,200 --> 00:27:05,033

You'll be using the documents provided in the student materials to adjudicate the sample Class Exercise and Exercises 1-3.

208

00:27:05,033 --> 00:27:13,099

If you haven't already done so, please print the exercise documents found in the student materials folders.

209

00:27:13,100 --> 00:27:22,100

The answers for the exercises are in your student materials provided for future reference.

210

00:27:22,100 --> 00:27:26,533

Now that we know what our requirements and processes are,

211

00:27:26,533 --> 00:27:31,366

let's adjudicate a sample transfer of operating rights together.